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**VIA ECF ONLY**

December 19<sup>th</sup>, 2023

The Hon. John G. Koeltl, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Request for adjournment of telephone conference in matter of  
Fernando Perez and Sandra Garcia v. Issachar Ibrahim and Motherland  
Logistics, LLC  
Docket No.: 1:23-CV-07378**

Dear Hon. Judge Koeltl,

This firm represents Plaintiff Sandra Garcia in the above-captioned matter. Counsel for all parties are in receipt of this Court's Order directing Counsel to appear telephonically on Thursday, December 21<sup>st</sup>, 2023, at 10:30 a.m. in regard to my letter requesting permission to move to remand this matter to New York State Supreme Court, Bronx County. Unfortunately on Thursday, December 21<sup>st</sup>, 2023, at 10:30 a.m. I will be on a flight and unavailable to participate in the telephone conference. As such, I am requesting that the telephone conference be moved to later in the day, after 2:00 p.m. or moved to another day this week or the following week. I have conferred with Co-Plaintiff's Counsel and Defense Counsel and they consent to this application. I respectfully thank the Court for considering my request.

Respectfully submitted,

*Joshua Brian Irwin*  
Joshua Brian Irwin, Esq. (JI-2756)

Conference adjourned to Thursday, 12/21/23  
at 4:00 p.m. so ordered.  
12/19/23 *Jr G Koeltl*  
U.S.D.J.